

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOUISE ROGERS TATE,

INDEX NO. 07 CV 5885(PKC)

Plaintiff(s),

-against-

ANSWER TO
CO-DEFENDANTS'
CROSS-CLAIMS

NANA GHOSH, MICHAEL COHEN, MOHD D. FARUGUE,
ARISTISIDIS SHISMEROS, WAI KWOK HA,
GOLAM MORTUJA, FRED WEINGARTEN, and HILTON
HOTELS CORPORATION,

Defendant(s).
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S I R S:

The defendants, FRED WEINGARTEN and GOLAM MORTUJA, by their attorneys, Gerber and Gerber, PLLC, answer the Cross-Claims of Co-Defendants as follows.

1. Deny each and every allegation contained in paragraphs numbered 15 and 16 of the Answer of Co-Defendant NANA GHOSH, which constitute the cross-claims of Co-Defendant NANA GHOSH against Defendants FRED WEINGARTEN and GOLAM MORTUJA.
2. Deny each and every allegation in paragraphs numbered 12 and 13 of the Answer And Cross-Claim of Co-Defendant MOHD D. FARUGUE, which constitute the cross-claims of Co-Defendant MOHD D. FARUGUE against Defendants FRED WEINGARTEN and GOLAM MORTUJA.
3. Deny each and every allegation in the unnumbered paragraph "AS AND FOR A CROSS COMPLAINT AGAINST CO-DEFENDANTS" in the Answer and Cross-Claim of Co-Defendant KWOK WAI HA s/h/a WAI KWOK HA, which constitute the cross-claims of Co-Defendant KWOK WAI HA s/h/a WAI

KWOK HA against Defendants FRED WEINGARTEN and GOLAM MORTUJA.

4. Denies each and every allegation in the unnumbered paragraph "CROSS-CLAIMS AGAINST CO-DEFENDANTS NANA GHOSH, MICHAEL COHEN, MOHD D. FARUGUE, ARISTISIDIS SHISMEROS, WAI KWOK HA, GOLAM MORTUJA and FRED WINGARTEN" in the Answer to Complaint of Co-Defendant HILTON HOTELS CORPORATION which constitute the cross-claims of Co-Defendant HILTON HOTELS CORPORATION against Defendants FRED WEINGARTEN and GOLAM MORTUJA.

Dated: Brooklyn, New York
November 2, 2007

Yours, etc.

GERBER & GERBER, PLLC
Attorneys for Defendant, FRED WEINGARTEN and GOLAM MORTUJA
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BY: FIDEL F. DEL VALLE, ESQ. (FD 1049)

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File: 747.004

Michael Cohen
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Aristidis Shismeros
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SOUTHERN DISTRICT OF NEW YORK

LOUISE ROGERS TATE,

Plaintiff(s),

-against-

NANA GHOSH, MICHAEL COHEN, MOHD D. FARUGUE, ARISTISIDIS SHISMEROS, WAI KWOK
HA, GOLAM MORTUJA, FRED WEINGARTEN, and HILTON HOTELS CORPORATION,
Defendant(s).

NOTICE OF APPEARANCE, ANSWER, CROSSCLAIM & DEMANDS

Yours, etc.

GERBER & GERBER, PLLC

Attorneys for Defendant, FRED WEINGARTEN and GOLAM MORTUJA

26 Court Street, Suite 1405

Brooklyn, New York 11242

718-834-0559

BY: FIDEL F. DEL VALLE, ESQ.

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STATE OF NEW YORK, COUNTY OF KINGS: ss.:

FIDEL F. DEL VALLE, ESQ., an attorney admitted to the practice of law before the various Courts of the State of New York and the United States District Court for the Southern District of New York, hereby affirms, pursuant to the C.P.L.R., under penalty of perjury, the following to be true:

On September 25, 2007, affirmant served the within ANSWER TO CO-DEFENDANTS' CROSS-CLAIMS on: HECHT, KLEEGER, PINTEL & DAMASHEK, Attorney for Plaintiff, 275 Madison Avenue, Suite 1100, New York, New York 10016; MARJORIE E. BORNES, Attorney for Defendant Nana Ghosh, 330 West 34th St, 7th Floor, New York, NY 10001; BAKER, McEVOY, MORRISSEY & MOSKOVITS, PC, Attorneys for Defendant Mohd D. Faugue, 330 West 34th St, 7th Floor, New York, NY 10001; Philip J. Rizzuto, PC, Attorney for Defendant Kwok Wai Ha s/h/a Wai Kwok Ha, One Old Country Road, Suite 285, Carl Place, NY 11514; Kaufman Borgeest & Ryan LLP, Attorneys for Defendant Hilton Hotels Corporation, 200 Summit Lake Drive, First Floor, Valhalla, NY 10595; electronically and by mail to Defendants Michael Cohen, 22-05 43rd Ave, Long Island City, NY 11101-5018; and Aristidis Shismeros, 11-06 Broadway, Astoria, NY 11106-4838 at the address designated by for the service of pleadings and papers purpose by depositing a true copy of same, enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.

Dated: Brooklyn, New York
November 2, 2007


FIDEL F. DEL VALLE, ESQ. (FD1049)